

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

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**IN RE: Michael W. Monaghan, Jr., Debtor**

**BK NO. 20-12239-JDW  
CHAPTER 7 CASE**

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**DEBTOR'S RESPONSE TO MOTION TO GRANT RELIEF FROM  
AUTOMATIC STAY AND FOR OTHER RELIEF**

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COMES NOW, Debtor, Michael W. Monaghan, Jr., by and through his attorney, James W. Amos, and by way of response to the motion to grant relief from automatic stay and for other relief filed by Carrington Mortgage Services, LLC, would say as follows:

1. Debtor admits the allegations contained in paragraph 1 of the motion.
2. Debtor admits the allegations contained in paragraph 2 of the motion.
3. Debtor admits the allegations contained in paragraph 3 of the motion.
4. Debtor denies the allegations contained in paragraph 4 of the motion.
5. Debtor denies the allegations contained in paragraph 5 of the motion.

NOW, having fully responded to the motion of Carrington Mortgage Services, LLC to grant relief from automatic stay and for other filed in the above referenced case, the Debtor prays that the motion be denied.

Respectfully submitted,

/s/ James W. Amos  
JAMES W. AMOS MSB #1559  
ATTORNEY FOR DEBTOR  
2430 CAFFEY ST.  
HERNANDO, MS 38632  
PHONE # (662) 429-7873

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 14<sup>th</sup> day of February, 2023, a copy of the foregoing electronically filed Response was served on the parties listed below by first-class mail, postage-prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Jeffrey A. Livingston  
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Carrington Mortgage Services, LLC  
c/o Eric Miller, Esq.  
[logsecf@logs.com](mailto:logsecf@logs.com)

Dated this 14<sup>th</sup> day of February, 2023.

/s/ James W. Amos  
JAMES W. AMOS